

## **REMARKS**

### **Status of Claims**

Claims 1-5 and 20-26 are pending and claims 23-26 are newly added claims. Reconsideration of the rejections of claims 1-5 and 20-22 is earnestly solicited in view of the following remarks.

### **Substance of the Interview**

Applicants thanks examiner Smith for granting the interview on March 11, 2005 and for considering the arguments made with respect to the property limitation of the independent claims 1 and 20. Applicants submits that the prior art, including Maslov and Saunders, is deficient with respect to a property attachment that preserves original data.

### **New Claims**

New claims 23-26 further define the claimed invention. Independent claim 23 clarifies the storage limitation of a property attached to a document. Neither U.S. Patent No. 5,946,499 to Saunders nor U.S. Patent No. 6,466,240 Maslov discloses the claimed storing of the original raw data in a property that is attachable to a document and attaching the property to a range within the document. Accordingly, for at least the reasons set forth above, claim 23 is allowable over the prior art.

Claims 24-26 depend on claim 23 and further defines novel features of the claimed invention. Accordingly, for at least the reasons set forth above, claims 24-26 are allowable over the prior art.

### **Rejection of Claims 20 and 21 under 35 U.S.C. § 102(e)**

Claims 20 and 21 were rejected under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent No. 5,946,499 to Saunders, herein referred to as Saunders. This rejection is respectfully traversed.

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). MPEP § 2131.01 (2004).

With respect to independent claim 20, Saunders does not disclose “a third method by which the handler is able to attach a property to the document at the range specified by the range object, the property providing access to original data used for insertion of text within the range.” The Office Action references Saunders at FIG. 5, col. 2, lines 42-45 and col. 6, lines 28-38 as anticipating the claimed invention. The Office Action further alleges that the disclosed unique identifier is a property attached to a range of text for the purpose of providing access to the range of text. The Office Action has mischaracterized this section of the disclosure, which explicitly states “[t]he unique identifier, as its name implies, is a value, e.g., a 32-bit value, supplied by the text service to uniquely identify the reserved portion.” Saunders further discloses, that a dictionary or spell check function is used to correct misspelled words. Saunders explicitly discloses that after receiving a range, a reservation is made and an update, replacement, is initiated. Column 7, lines 5-10 The dictionary and spell check functions disclosed by Saunders are replacement functions and do not provide for insertion of additional text.

Saunders does not disclose attaching a property to the document at the range specified by the range object, the property **providing access to original data** used for insertion of text within the range. Unlike Saunders, the present invention allows access to original data used to derive the additional insertion text. Accordingly, for at least the reasons set forth above, claim 20 is allowable over the prior art.

Claim 22 depends from claim 20 and further defines novel features of the claimed invention. Accordingly, claim 22 is allowable by virtue of its dependence on claim 20. Withdrawal of the rejection under 35 U.S.C. § 102(e) is respectfully requested.

**Rejection of claims 1-5 and 22 under 35 U.S.C. §103(a)**

Claims 1-5 and 22 have been rejected under 35 U.S.C. §103(a) over Saunders in view of U.S. Patent No. 6,466,240 to Maslov (hereinafter “Maslov”). This rejection is respectfully traversed.

“To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must

be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure." *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). MPEP 706.02(j).

With respect to independent claim 1, Saunders in view of Maslov fail to disclose the claimed features of the present invention, and the Office Action fails to provide any reference that includes the claimed features. Saunders in view of Maslov fail to disclose "a dynamic text interface in which the abstraction of the document is such that a position within the document is represented as a floating anchor to a node, and a text processor input method for attaching a property to the document in at least one position in the document, wherein the property preserves originally entered data in order to facilitate text correction."

The Office Action alleges that Saunders FIG. 5, col. 2, lines 42-45 and col. 6 lines 28-38 discloses the claimed property that preserves originally entered data. As discussed above, the unique identifier, referenced by the Office Action, does not preserve original data. The identifier merely identifies a reserved portion of the document. Furthermore, Saunders teaches away from preserving original data when performing a spell check. Saunders discloses that during the spell check an update procedure replaces the text in the specified range and upon completion a fix event removes the reservation. Therefore, Saunders discloses that the corrections are immediately made final and there is no preservation of the original data.

The Office Action, also, alleges that Maslov, col. 2, lines 62-col 3, line 17 and col. 3 lines 36-44, discloses the claimed dynamic text interface and a position represented as a floating anchor node. The sections referenced by the office action discloses a tree structure that represents the structure of the document and tree transformation operations, which may be recorded as macros. Maslov further discloses deleting nodes and synchronizing selection of text in two window panes, a tree window and a text window. Column 4, lines 35-60. Maslov fails to disclose a node that references a floating anchor that refers to a position of text within the document.

In Summary, Saunders does not disclose the property **preserves access to originally entered data**. Unlike Saunders, the present invention preserves the original data to allows subsequent access to original data used when deriving insertion text. Maslov does not disclose a position within the document is represented as a **floating anchor** node. Unlike Maslov, the present invention uses the floating anchors to retain reference to a position within the document as text is inserted and deleted. Therefore, the combination of Saunders and Maslov fail to disclose the claimed features of the present invention. Accordingly, for at least the reasons set forth above, claim 1 is allowable over the prior art.

Claims 2-5 depend from claim 1 and further define novel features of the claimed invention. Accordingly, for at least the reasons set forth above with respect to claim 1, claims 2-5 are allowable over the prior art.

Claim 22 depends from claim 20 and further defines novel features of the claimed invention. Accordingly, for at least the reasons set forth above with respect to claim 20, claim 22 is allowable over the prior art.

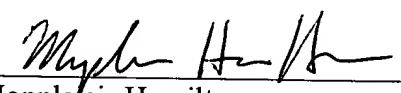
To make a prima facie case of obviousness, the references must teach or suggest all the claim limitations. Saunders and Maslov fail to teach or suggest the limitations of claims 1-5 and 22. Therefore, for at least the reasons set forth above, the §103 rejection should be withdrawn.

**CONCLUSION**

Claims 1-5 and 20-26 are pending in this application. In view of the amendments and remarks, applicants respectfully request that this application be allowed and passed to issue. Should any issues remain prior to issuance of this application, the Examiner is urged to contact the undersigned to resolve the same. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112 referencing Attorney Docket No. MFCP.87507.

Respectfully submitted,

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